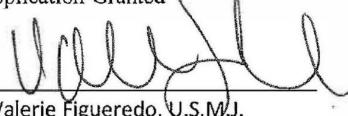


Application Granted



Valerie Figueredo, U.S.M.J.

DATED: 3-7-24

For the reasons identified in the Court's order at ECF No. 124, the requests to redact and seal herein are granted. The Clerk of Court is respectfully directed to maintain ECF No. 136 under seal and to terminate the motion at ECF No. 135.

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March 6, 2024

VIA ECF

Honorable Lewis A. Kaplan
United States District Judge
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *Application of B&C KB Holding GmbH for an Order to take Discovery Pursuant to 28 U.S.C. § 1782 from Goldberg Lindsay & Co. LLC d/b/a Lindsay Goldberg and Michael Dees*, Case No. 1:22-mc-00180-LAK-VF

Dear Judge Kaplan:

On behalf of Applicant B&C KB Holding GmbH (“B&C”), pursuant to Your Honor’s Individual Rules of Practice, we respectfully request leave to redact and file under seal certain information contained in B&C’s opposition to Respondents’ objection to Magistrate Judge Figueredo’s order denying Respondents’ motion to quash and alternative relief requested therein (“Opposition”), to be filed today.

The Opposition reflects certain information contained in Respondents’ objection, filed on February 21, 2024 (ECF Nos. 129 and 130), which information Respondents moved to redact on the basis that it (i) concerns prosecutorial communications regarding discovery sought or documents that have been submitted in connection with an ongoing criminal investigation; and (ii) contains identifying information regarding allegations made against or regarding specific individuals based in Europe in confidential proceedings (ECF No. 128). Your Honor granted Respondents’ motion to seal (ECF No. 131). In the interest of maintaining the confidentiality of that information, and for the reasons set forth in Respondents’ motion to redact/seal, B&C respectfully requests that the Court permit the redaction of B&C’s Opposition.

We thank the Court for its attention to this matter.

Respectfully submitted,

s/ Leif T. Simonson
Zachary D. Rosenbaum
Leif T. Simonson

Counsel for the Petitioner

cc: All counsel of record (via ECF)